

**BEFORE THE  
BOARD OF PSYCHOLOGY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

Case No. W210

### DEFAULT DECISION

**Respondent.**

On June 6, 2001, Accusation No. W210 was issued by the Board of Psychology, Department of Consumer Affairs, State of California, (hereinafter the "Board") against Carolyn L. Harlan, Ph.D. (hereinafter "respondent") alleging unprofessional conduct, gross negligence, and sexual misconduct. A true and correct copy of the Accusation is attached hereto as Exhibit A and made a part hereof.

On June 6, 2001, an employee of the Board caused the Accusation against respondent, together with the Statement to Respondent, Request for Discovery, copy of Government Code sections 11507.5, 11507.6 and 11507.7, Disciplinary Guidelines, and form

1 Notice of Defense to be sent to respondent at the following addresses:

- 2 1. 1633 Bayshore Highway, Suite 385, Burlingame, CA 94010 (address of  
3 record on file with the Board).
- 4 2. 851 Burlway Rd., Ste. 206, Burlingame, CA 94010 (last known office  
5 address).
- 6 3. 4 Bluebell Lane, San Carlos, CA 94070 (last known residence address).
- 7 4. 8605 Allisonville Rd., #105, Indianapolis, IN 46250 (last known mailing  
8 address), via U.S. Mail (certified mail, return receipt requested) as provided by Government  
9 Code sections 11503 and 11505, and Business and Professions Code section 124.

10 On June 18, 2001, the Board received the certified/return receipt from the postal  
11 service indicating that service of the accusation and related documents was accomplished at  
12 respondent's last known office address. On June 25, 2001, the Board received the  
13 certified/return receipt from the postal service indicating that service of the accusation and  
14 related documents was accomplished at respondent's last known residence address. On June 21,  
15 2001, the Board received the certified/return receipt from the postal service indicating that  
16 service of the accusation and related documents was accomplished at respondent's last known  
17 mailing address in Indianapolis, IN.

18 No response was received regarding the delivery of the Accusation and related  
19 documents to respondent's address of record on file with the Board. Investigation into  
20 respondent's address of record on file revealed that Suite 385 at 1633 Old Bayshore Highway,  
21 Burlingame, CA no longer existed and that respondent had moved out of the building and did not  
22 leave a forwarding address. True copies of the certified mail receipts are attached hereto as  
23 Exhibits B, C and D, respectively.

24 The method of notice was reasonably calculated to give the licensee notice and  
25 satisfies the requirements of Government Code section 11505. Respondent has not contacted the  
26 Board or returned the Notice of Defense. The Board has determined that respondent is in default  
27 and that respondent has waived her right to a hearing and to contest the merits of the Accusation.

## FINDINGS OF FACT

The Board now makes the following findings of fact:

1. Thomas S. O'Connor, complainant herein, was the Executive Officer of the Board of Psychology, State of California, and made the charges and allegations in the Accusation solely in his official capacity.

2. At all times material herein, respondent Carolyn L. Harlan, Ph.D., has held Psychologist's License No.PSY 9778, which was issued to her by the Board on or about March 2, 1987. The license was expired on January 31, 2001 and has not been renewed.

3. On or about February, 1995, respondent undertook to care for and treat C.B. and D.B., at her professional offices in Burlingame, California 94010.

4. C.B. and D.B. were having family and marital problems when they began seeing respondent for counseling in February of 1995. Counseling with respondent included discussing problems they were having with their two daughters. They saw respondent, once a week, for treatment as a couple and as individuals for approximable two years, until May of 1997.

5. On or about May of 1997, C.B. complained of back pain while attending an individual therapy session. Respondent offered to relieve his pain by providing him with a treatment called "zero balancing." Respondent had C.B. lay on his back on the floor while respondent massaged his feet, legs, and reached around his lower back with her hands while leaning close on top of him. Respondent's breasts touched C.B. when she reached around his lower back to massage him.

6. Throughout therapy, respondent and C.B. discussed their mutual personal interests, such as skiing. On or about May of 1997, during a therapy session, respondent and C.B. discussed surfing and she and C.B. scheduled a surfing lesson together for May 14, 1997.

7. On or about May 14, 1997, C.B. picked respondent up at her home and drove her to her surfing lesson in Santa Cruz, California. After her surfing lesson, respondent and C.B. surfed together. C.B. drove respondent home and they agreed to get together at her home

1 for yoga the next morning.

2 8. On or about May 15, 1997 C.B. met respondent at her home and they had  
3 breakfast together. That morning, C.B. and respondent engaged in sexual intercourse at  
4 respondent's home.

5 9. After starting a sexual relationship with C.B., respondent continued to treat  
6 C.B. and D.B. for two more sessions before ending their treatment. Respondent wanted to  
7 continue treating C.B. and D.B. but C.B. told respondent he wanted to stop counseling.

8 10. Respondent told D.B. that she did not need further counseling and that her  
9 marriage would be "fine". D.B. did not know that respondent and her husband, C.B., had  
10 engaged and were engaging in sexual intercourse at the time respondent told her she no longer  
11 needed counseling. Respondent did not refer C.B. or D.B. to another therapist.

12 11. C.B. and respondent had sexual intercourse at respondent's house, her  
13 office, the beach, and several other places. C.B. and respondent continued their sexual  
14 relationship for two years, until 1999.

15 12. C.B. and respondent ended their relationship in 1999 because respondent  
16 compared C.B. to other men which hurt C.B.'s feelings.

17 13. On or about November of 1999, D.B. contacted respondent to arrange for  
18 a therapy appointment because she and C.B. continued to have marital problems. Respondent  
19 did not return D.B.'s telephone call. D.B. called respondent again prior to Christmas in 1999 to  
20 request a referral to another therapist but respondent never returned her call.

21 14. D.B. knew that C.B. and respondent had a personal relationship with each  
22 other but she did not know that it was a sexual relationship. It wasn't until after Christmas of  
23 1999 that D.B. found a court document indicating that C.B. was suing respondent for  
24 malpractice. D.B. discovered the sexual nature of the relationship after reading in a court  
25 document that C.B. alleged that he and respondent had engaged in sexual intercourse since May  
26 of 1997.

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1  
2 **DETERMINATION OF ISSUES**

3 I

4 15. Respondent's conduct constitutes a violation of Business and Professions  
5 Code § 2960(o) in that respondent engaged in a sexual relationship with patient C.B. while he  
6 was her patient as set forth in Findings of Facts 1 through 14, inclusive, above. Respondent's  
7 license is subject to disciplinary action for the reasons stated above and cause for revocation is  
8 established.

9 II

10 16. Respondent is subject to disciplinary action pursuant to section 2960,  
11 subsections (j) (gross negligence) and (i)(violating rule of professional conduct) and Title 16  
12 California Code of Regulations section 1396.1 (psychologist's personal problems adversely affect  
13 treatment or harm patient) in that she engaged in the conduct as set forth in Findings of Fact as  
14 set forth in paragraphs 1 through 14, inclusive. Respondent shared her own personal feelings  
15 with C.B. during therapy, engaged in sexual intercourse with C.B. while he was a patient,  
16 continued to have sexual intercourse with C.B. after she terminated therapy, and failed to refer  
17 C.B. to another therapist after she terminated therapy with him. Respondent also exacerbated  
18 C.B.'s marital problems by engaging in a sexual relationship with him. Respondent's license is  
19 subject to disciplinary action for the reasons stated above and cause for revocation is established.

20 III

21 17. Respondent is subject to disciplinary action pursuant to section 2960,  
22 subsections (j) (gross negligence) and (i)(violating rule of professional conduct) and Title 16  
23 California Code of Regulations section 1396.1 (psychologist's personal problems adversely affect  
24 treatment or harm patient) in that she engaged in the conduct as set forth in the Findings of Fact  
25 in paragraphs 1 through 14, inclusive, above. Respondent breached her fiduciary duty to patient  
26 D.B. by engaging in sexual intercourse with D.B.'s husband, C.B. Respondent knew that D.B.  
27 and C.B. were having marital difficulties and she destroyed D.B.'s and C.B.'s ability to resolve

1 their marital conflicts by having sexual intercourse with C.B. Respondent destroyed the  
2 therapeutic relationship with D.B. and betrayed the professional trust D.B. had placed in her as a  
3 therapist by engaging in a sexual relationship with D.B.'s husband. Respondent failed to  
4 evaluate or consider the actual and/or potential emotional and psychological harm that her  
5 actions would have on this patient. Respondent's license is subject to disciplinary action for  
6 these reasons and cause for revocation is established.

7 IV

8 18. Complainant has incurred \$2,736.90 in investigation costs and \$2,668.00  
9 in enforcement costs including attorneys fees, which costs were reasonably incurred in the  
10 prosecution of the case. A copy of a declaration of actual investigative hours spent on the case is  
11 attached hereto as Exhibit E. A copy of a declaration of prosecution costs is attached hereto as  
12 Exhibit F.

13 ORDER

14 WHEREFORE, the following order is hereby made:


15 1. Psychologist License No.PSY 9778, heretofore issued to respondent Carolyn  
16 L. Harlan, Ph.D., is hereby revoked separately and severally as to each of the Determination of  
17 Issues I through III set forth above.

18 2. Respondent shall pay reasonable costs of prosecution and enforcement as set  
19 forth in Determination of Issues IV above.

20 3. Respondent shall not be deprived of making any further showing by way of  
21 mitigation; however, such showing must be made to the Board of Psychology, 1422 Howe  
22 Avenue, Suite 22, Sacramento, CA 95825, prior to the effective date of this decision.

23 This decision shall become effective on October 13, 2001.

24 IT IS SO ORDERED this 13th day of September, 2001.

25  
26   
27 BOARD OF PSYCHOLOGY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA  
MARTIN R, GREENBERG, Ph.D., PRESIDENT

Attachments: Exhibits A, B, C, D, E & F

**EXHIBIT A**

1 BILL LOCKYER, Attorney General  
of the State of California  
2 SUSAN K. MEADOWS, State Bar No.115092  
Deputy Attorney General  
3 455 Golden Gate Ave, Suite 11000  
San Francisco, California 94102  
4 Telephone: (415) 703-5552  
Fax: (415) 703-5480

5 Attorneys for Complainant

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8 **BEFORE THE**  
9 **BOARD OF PSYCHOLOGY**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against )

Case No. W210

12 Carolyn L. Harlan, Ph.D.  
13 1633 Bayshore Highway, Suite 385  
Burlingame, CA 94010  
(Address of Record)

14 )  
15 ) ACCUSATION  
16 )

Psychologist's License No. PSY 9778

17 Respondent.  
18  
19

20 The Complainant alleges:

21 PARTIES

22 1. Complainant, Thomas S. O'Connor, is the Executive Officer of the  
23 California Board of Psychology ("Board of Psychology" or "board") and brings this accusation  
24 solely in his official capacity.

25 2. At all times material, respondent Carolyn L. Harlan, Ph.D. ("respondent")  
26 has held Psychologist's License No. PSY 9778 which was issued to her by the board on or about  
27 March 2, 1987. The license expired on January 31, 2001 and has not been renewed.

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FILED  
STATE OF CALIFORNIA  
BOARD OF PSYCHOLOGY  
SACRAMENTO 6/16 2001  
BY M. Jackman ANALYST



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1 that in any order issued in resolution of a disciplinary proceeding before any board within the  
2 California Department of Consumer Affairs, the board may request the administrative law judge  
3 to direct a licensee found to have committed a violation or violations of the licensing act to pay  
4 a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

5 7. Business and Professions Code section 2962.6 provides that "[an  
6 administrative disciplinary decision that imposes terms of probation may include, among other  
7 things, a requirement that the licensee who is being placed on probation pay the monetary costs  
8 associated with monitoring the probation."

9 8. Section 118 of the Business and Professions Code provides, in relevant part,  
10 that the expiration of a license issued by a board shall not during any period in which it may be  
11 renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or  
12 continue a disciplinary proceeding against the licensee upon any ground provided by law..."

13 9. Section 2960.1 of the Business and Professions Code provides, in relevant part,  
14 that if a proposed decision or decision issued under this chapter contains any finding of fact  
15 that the licensee engaged in any act of sexual contact, as defined in section 729, when that act is  
16 with a patient or with a former patient when the relationship was terminated primarily for the  
17 purpose of engaging in that act, shall contain a order of revocation.

#### 18 FACTS

19 10. At all times relevant to this matter, respondent practiced as a psychologist  
20 in the State of California.

21 11. On or about February, 1995, respondent undertook to care for and treat  
22 C.B. and D.B.,<sup>1/</sup> at her professional offices in Burlingame, California 94010.

23 12. C.B. and D.B. were having family and marital problems when they began  
24 seeing respondent for counseling in February of 1995. Counseling with respondent included  
25 discussing problems they were having with their two daughters. They saw respondent, once a  
26

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27 1. Initials are used to protect the privacy of the patients. The full names of the patients will be disclosed upon receipt of respondent's Request for Discovery.

1 week, for treatment as a couple and as individuals for approximately two years, until May of  
2 1997.

3 13. On or about May of 1997, C.B. complained of back pain while attending  
4 an individual therapy session. Respondent offered to relieve his pain by providing him with a  
5 treatment called "zero balancing." Respondent had C.B. lay on his back on the floor while  
6 respondent massaged his feet, legs, and reached around his lower back with her hands while  
7 leaning close on top of him. Respondent's breasts touched C.B. when she reached around his  
8 lower back to massage him.

9 14. Throughout therapy, respondent and C.B. discussed their mutual personal  
10 interests, such as skiing. On or about May of 1997, during a therapy session, respondent and  
11 C.B. discussed surfing and she and C.B. scheduled a surfing lesson together for May 14, 1997.

12 15. On or about May 14, 1997, C.B. picked respondent up at her home and  
13 drove her to her surfing lesson in Santa Cruz, California. After her surfing lesson, respondent and  
14 C.B. surfed together. C.B. drove respondent home and they agreed to get together at her home  
15 for yoga the next morning.

16 16. On or about May 15, 1997 C.B. met respondent at her home and they had  
17 breakfast together. That morning, C.B. and respondent engaged in sexual intercourse at  
18 respondent's home.

19 17. After starting a sexual relationship with C.B., respondent continued to treat  
20 C.B. and D.B. for two more sessions before ending their treatment. Respondent wanted to  
21 continue treating C.B. and D.B. but C.B. told respondent he wanted to stop counseling.

22 18.. Respondent told D.B. that she did not need further counseling and that her  
23 marriage would be "fine". D.B. did not know that respondent and her husband, C.B., had  
24 engaged and were engaging in sexual intercourse at the time respondent told her she no longer  
25 needed counseling. Respondent did not refer C.B. or D.B. to another therapist.

26 19. C.B. and respondent had sexual intercourse at respondent's house, her  
27 office, the beach, and several other places. C.B. and respondent continued their sexual

1 relationship for two years, until 1999.

2 20. C.B. and respondent ended their relationship in 1999 because respondent  
3 compared C.B. to other men which hurt C.B.'s feelings.

4 21. On or about November of 1999, D.B. contacted respondent to arrange for  
5 a therapy appointment because she and C.B. continued to have marital problems. Respondent  
6 did not return D.B.'s telephone call. D.B. called respondent again prior to Christmas in 1999 to  
7 request a referral to another therapist but respondent never returned her call.

8 22. D.B. knew that C.B. and respondent had a personal relationship with each  
9 other but she did not know that it was a sexual relationship. It wasn't until after Christmas of  
10 1999 that D.B. found a court document indicating that C.B. was suing respondent for  
11 malpractice. D.B. read in the court document that C.B. alleged that he and respondent had  
12 engaged in sexual intercourse since May of 1997.

13 **FIRST CAUSE FOR DISCIPLINARY ACTION**

14 **(Patient C.B.)**

15 **(Sexual Misconduct)**

16 23. Respondent is subject to disciplinary action pursuant to section 2960  
17 subsection (o) in that she engaged in a sexual relationship with patient C.B. while he was her  
18 patient as described above in paragraphs 10 through 22, inclusive, above. Therefore, cause for  
19 discipline exists.

20 **SECOND CAUSE FOR DISCIPLINARY ACTION**

21 **(Patient C.B.)**

22 **(Gross Negligence and Violating a Rule of Professional Conduct)**

23 24. Respondent is subject to disciplinary action pursuant to section 2960,  
24 subsections (j) (gross negligence) and (i)(violating rule of professional conduct) and Title 16  
25 California Code of Regulations section 1396.1 (psychologist's personal problems adversely affect  
26 treatment or harm patient) in that she engaged in the conduct alleged in paragraphs 10 through  
27 22, inclusive, above in that she shared her own personal feelings with C.B. during therapy,

1 engaged in sexual intercourse with C.B. while he was a patient, continued to have sexual  
2 intercourse with C.B. after she terminated therapy, and failed to refer C.B. to another therapist  
3 after she terminated therapy with him. Respondent also exacerbated C.B.'s marital problems by  
4 engaging in a sexual relationship with him. Therefore, cause for discipline exists.

5 **THIRD CAUSE FOR DISCIPLINARY ACTION**

6 **(Patient D.B.)**

7 **(Gross Negligence, Violation of Professional Rule)**

8 25. Respondent is subject to disciplinary action pursuant to section 2960,  
9 subsections (j) (gross negligence) and (i)(violating rule of professional conduct) and Title 16  
10 California Code of Regulations section 1396.1 (psychologist's personal problems adversely affect  
11 treatment or harm patient) in that she engaged in the conduct alleged in paragraphs 10 through  
12 22, inclusive, above in that respondent breached her fiduciary duty to patient D.B. by engaging in  
13 sexual intercourse with D.B.'s husband, C.B. Respondent knew that D.B. and C.B. were having  
14 marital difficulty and she destroyed D.B.'s and C.B.'s ability to resolve their marital conflicts by  
15 having sexual intercourse with C.B. Respondent destroyed the therapeutic relationship with D.B.  
16 and betrayed the professional trust D.B. had placed in her as a therapist by engaging in a sexual  
17 relationship with D.B.'s husband. Respondent failed to evaluate or consider the actual and/or  
18 potential emotional and psychological harm that her actions would have on this patient.  
19 Therefore, cause for discipline exists.

20 WHEREFORE, complainant requests that a hearing be held on the matters alleged  
21 above, and that following the hearing, the board issue a decision:

- 22 1. Suspending or revoking Psychology License No. PSY 9778 issued to  
23 respondent Carolyn L. Harlan, Ph.D.;
- 24 2. Ordering respondent to pay the board the actual and reasonable costs of  
25 the investigation and enforcement of this case and, if placed on probation, the costs of probation  
26 monitoring; and

27 //

1                    3.     Taking such other and further action as the board deems necessary and  
2 proper.

3 DATED: June 6, 2001

4   
5 THOMAS S. O'CONNOR, Executive Officer  
6 Board of Psychology

7 Complainant  
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**EXHIBIT B**

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Carolyn L. Harlan, Ph.D.  
851 Burlway Road, Suite 206  
Burlingame, CA 94010

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature

X

☐ Agent☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number (Copy from service label)

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

7099 3400 0002 4471 5692

ACC 00 105612



**EXHIBIT C**

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Carolyn L. Harlan, Ph.D.  
4 Bluebell Lane  
San Carlos, CA 94070

2. Article Number (Copy from service label)

PS Form 3811, July 1999

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature

X.

☐ Agent☐ AddresseeD. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

7099 3400 0002 4471 5753

Domestic Return Receipt

102595-99-M-1789

RECEIVED  
GENERAL  
JUL 27 10:13  
U.S. JUSTICE  
SAN FRANCISCO

**EXHIBIT D**

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Carolyn L. Harlan, Ph.D.  
8605 Allisonville Road, #105  
Indianapolis, IN 46250

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature ☐ Agent  
X *[Signature]* ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type ☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.  
4. Restricted Delivery (Extra Fee) ☐ Yes

2. Article Number (Copy from service label)

7099 3400 0002 4471 5722

PS Form 3811, July 1999

ACC 00 105612

Domestic Return Receipt

102595-99-M-1789

**EXHIBIT E**



# MEDICAL BOARD OF CALIFORNIA

## ENFORCEMENT PROGRAM

1735 TECHNOLOGY DRIVE, SUITE 800

SAN JOSE, CA 95110-1313

(408) 437-3680 FAX (408) 437-3693

www.medbd.ca.gov



### CERTIFICATION OF COSTS OF INVESTIGATION AND ENFORCEMENT PURSUANT TO BUSINESS AND PROFESSIONS CODE SECTION 125.3

In the Matter of the Accusation Against:

Carolyn Harlan, Ph.D.

Psychology Certificate No.: PSY-9778

Accusation Number: W210

Medical Board of California Case Number: 1F 2000 105612

### DECLARATION

I, Andrew Hegelein, am the Supervising Investigator for the San Jose District Office of the Medical Board of California, and in that capacity I have been designated as the representative to certify the costs incurred by the agency in the investigation and enforcement of the above described disciplinary action.

I have reviewed the pertinent records of the Board and certify that the following costs were approved for investigation and enforcement services rendered in this case, up to the date of the administrative hearing:

### Medical Board of California Investigative Services:

Time and other expenses for the investigation of allegations against respondent which include, but are not limited to, conducting witness interviews, procuring evidence and medical records, travel, and report writing; time and other expenses for supplemental tasks related to the investigation and prosecution of this case:

<u>Fiscal</u> <u>Year</u>	<u>No. of</u> <u>Hours</u>	<u>Hourly</u> <u>Rate*</u>	<u>Total</u> <u>Charges</u>
1999/2000	15	\$81.92	\$1,228.80
2000/2001	15	\$85.54	\$1,283.10
			\$2,511.90

Of the costs shown above, approximately 4.5 hours were spent on conducting interviews; 7 hours spent on records review; 5.5 hours spent on travel; 10.5 hours spent on report writing. The balance of time (2.50 hours) was spent on collecting evidence and preparing a subpoena.

**Miscellaneous Expense Items:** [i.e., copying and subpoena service]

None

**Expert Reviewer Services:**

Time and other expenses billed to the Medical Board by experts for reviewing and evaluating case-related materials, report writing, hearing preparation and examinations:

<u>Service</u>	<u>Date(s)</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Review	11/24/00	2	\$75.00	\$150.00
	11/30/00	2		\$150.00
	12/01/00	3		\$225.00

**MEDICAL BOARD OF CALIFORNIA TOTAL COSTS:** \$ 3,036.90

**CERTIFICATION**

I certify pursuant to the provisions of Business and Professions Code Section 125.3 that to the best of my knowledge the foregoing certification of costs incurred by the Medical Board of California is true and correct and the amounts set forth do not exceed the actual and reasonable costs of investigation and enforcement of Accusation Number W210, and that these costs fall within the range of costs this Board has incurred in other license disciplinary actions of a similar nature.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 3<sup>rd</sup> day of August, 2001, at San Jose, California.

  
Supervising Investigator

San Jose  
District Office

Note: Attorney fees and other legal fees will be certified by the Office of the Attorney General.

**EXHIBIT F**



1 BILL LOCKYER, Attorney General  
of the State of California  
2 SUSAN K. MEADOWS, State Bar No. 115092  
Deputy Attorney General  
3 California Department of Justice  
455 Golden Gate Avenue, Suite 11000  
4 San Francisco, California 94102  
Telephone: (415) 703-5552  
5 Facsimile: (415) 703-5480

6 Attorneys for Complainant

7  
8 **BEFORE THE**  
**BOARD OF PSYCHOLOGY**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. W210

12 CAROLYN HARLAN, PH.D.  
1633 Bayshore Highway, Suite 385  
13 Burlingame CA 94010

**CERTIFICATION OF COSTS:**  
**DECLARATION OF SUSAN K.**  
**MEADOWS**

14 Psychologist's License No. PSY 9778

Respondent.

[Bus. & Prof. Code §125.3]

16  
17 I, SUSAN K. MEADOWS, hereby declare and certify as follows:

18 1. I am a Deputy Attorney General employed by the California Department  
19 of Justice ("DOJ"), Office of the Attorney General ("Office"). I am assigned to the Health  
20 Quality Enforcement Section in the Civil Division of the Office. I have been designated as the  
21 representative to certify the costs of prosecution by DOJ and incurred by the Board of  
22 Psychology in this case. I make this certification in my official capacity and as an officer of the  
23 court.

24 2. I represent the Complainant, Thomas S. O'Connor, Executive Officer of  
25 the Board of Psychology, in this action. I was assigned to handle this case on or around May 1,  
26 2001.

27 3. As the Deputy Attorney General assigned to handle this case, I performed  
28 a wide variety of tasks that were necessary for the prosecution of this matter, including, but not

1 limited to (1) conducting an initial case evaluation; (2) obtaining, reading and reviewing the  
2 investigative material and requesting further investigation, as needed; (3) drafting pleadings,  
3 correspondence, memoranda, and other case-related documents; (4) researching relevant points  
4 of law and fact; (5) consulting and/or meeting with colleague deputies, supervisory staff, client  
5 staff and investigators.

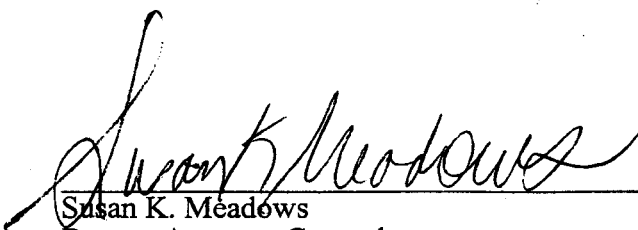
6 4. I am personally familiar with the time recording and billing practices of  
7 DOJ and the procedure for charging the client agency for the reasonable and necessary work  
8 performed on a particular case. Whenever work is performed on a case, it is the duty of the  
9 employee to keep track of the time spent and to report that time on DOJ time sheets at or near the  
10 time of the tasks performed. Based upon the time reported through July 29, 2001, DOJ has billed  
11 or will bill the Board for the following amount of time spent working on the above entitled case.

<u>Employee/ Position</u>	<u>Fiscal Year</u>	<u>No. of Hours</u>	<u>Hourly Rate</u>	<u>Total Charges</u>
Susan K. Meadows Deputy Attorney General	2001-2002	3.00	\$112.00	\$336.00
Susan K. Meadows Deputy Attorney General	2000-2001	22.00	\$106.00	\$2,332.00
				TOTAL: \$2,668.00

17  
18 5. To the best of my knowledge the items of cost set forth in this certification  
19 are correct and were necessarily incurred in this case.

20 I certify under penalty of perjury under the laws of the State of California that the  
21 foregoing is true and correct.

22 Executed on August 8, 2001, in the City of San Francisco, California.

23  
24  
25   
26 Susan K. Meadows  
Deputy Attorney General

27 Declarant

DECLARATION OF SERVICE BY CERTIFIED MAIL

In the Matter of the Accusation

Filed Against: Carolyn Harlan, Ph.D.

No: W210

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause; my business address is 1422 Howe Avenue, Sacramento, California 95825. I served a true copy of the attached:

DECISION AND ORDER

by mail on each of the following, by placing same in an envelope (or envelopes) addressed (respectively) as follows:

NAME AND ADDRESS

CERT NO.

Carolyn Harlan, Ph.D.  
1633 Bayshore Highway, Suite 385  
Burlingame, CA 94010

7000 0520 0021 8424 3189

Carolyn Harlan, Ph.D.  
851 Burlway Road, Suite 206  
Burlingame, CA 94010

7000 0520 0021 8424 3196

Carolyn Harlan, Ph.D.  
8605 Allisonville Road, #105  
Indianapolis, IN 46250

7000 0520 0021 8424 3172

Carolyn Harlan, Ph.D.  
4 Bluebell Lane  
San Carlos, CA 94070

7000 0520 0021 8424 3165

Susan K. Meadows  
Deputy Attorney General  
455 Golden Gate Ave, Ste. 11000  
San Francisco, CA 94102

Each said envelope was then, on September 13, 2001 sealed and deposited in the United States mail at Sacramento, California, the county in which I am employed, as certified mail, with the postage thereon fully prepaid, and return receipt requested.

Executed on September 13, 2001 at Sacramento, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

  
Mary Laackmann  
DECLARANT